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November 18, 2013

Claimants with Pending Compensation Claims
the Subject of LBHI's Omnibus Objection
Nos. 73, 118, 130, 131, 133, 134, 135, 176,
185, 207, 313, 314, 319 & 347
(By Email and Electronic Service)

Re: Status Conference & Conference re Hearing
Procedures, Nov. 22, 2013, 10:00 a.m.

Dear Claimants:

This letter provides notice of a status conference and a conference regarding evidentiary hearing procedures to be held at 10:00 a.m. on Friday, November 22, 2013, before the Hon. James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, NY 10004.

This conference was requested by all claimants who are represented by counsel in opposing the Objections referenced above. Please refer to the attached letter dated October 9, 2013. The date for this conference was set by the Court.

The Court's instructions were for counsel for LBHI and for represented claimants to work on the form of an Order and, if they were able to reach agreement, to advise the Court so the conference could be cancelled. Last Friday evening we learned that LBHI would not agree to hearing dates acceptable to represented claimants and the Court, but rather insisted on a date three weeks earlier that claimants' counsel concluded would not permit sufficient time for briefing and the preparation of related documents. Since agreement could not be reached, the conference will proceed. We expect to discuss with the Court hearing dates of either February 25-26 or March 4-5. The Court has indicated that both sets of dates are acceptable.

Judge Peck's rules permit parties located more than a one hour commute from the Court House to participate by telephone. For permission you must contact Judge Peck's Chambers in advance at (212) 668-5632. After receiving the permission of the Court, you may contact CourtCall at (866) 582-6878 for instructions on how to attend by telephone.

Very truly yours,


Richard J. Schager, Jr.

RJS/kr

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November 18, 2013

cc: Denise Alvarez, Esq. - Weil Gotshal & Manges LLP
Teresa Brady, Esq. - Weil Gotshal & Manges LLP
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October 9, 2013

BY HAND

Hon. James M. Peck, U.S.B.J.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: *In re Lehman Brothers Holdings Inc.*, Case No. 08-13555 (JMP)
Request for Chambers Conference Regarding Claims Related
to Restricted Stock Units and Contingents Stock Awards

Dear Judge Peck:

We write on behalf of claimants represented by counsel with claims for unpaid compensation related to Restricted Stock Units or Contingent Stock Awards. This letter is submitted pursuant to Section 14 of the Discovery Procedures Order (ECF 40334), to report on discovery and to request a chambers conference to discuss the status of these claims and procedures for an Evidentiary Hearing.

1. Discovery. As the Court knows from its approving Order entered October 2 (ECF 40263), after our letter to the Court of last April 29 we were successful in negotiating with LBHI a limited stipulation of facts, dealing with tax and accounting issues and related matters. By October 25 the parties will have concluded either a supplemental stipulation or a Rule 30(b)(6) deposition, which will address (i) the financial statement presentation of the expense related to the issuance of RSUs and CSAs, including the extent to which that expense was shown on the balance sheet, and (ii) the settlement of inter-company claims related to RSUs and CSAs. Counsel for Claimants and LBHI currently are working on a supplemental stipulation; a deposition is scheduled for October 25 if these efforts are not successful. These stipulations only cover the subjects outlined in claimants' 30(b)(6) deposition notice concerning the accounting and tax treatment of RSUs and CSAs, and do not address other facts and legal issues that will be presented to the Court in support of the claimants' position at any evidentiary hearing.

2. Evidentiary Hearing Procedures Order. The parties also have exchanged drafts of an Order setting forth procedures for an Evidentiary Hearing. LBHI proposed an Order on July 8, and claimants responded on July 25 proposing an accelerated briefing schedule. To date LBHI has not responded to Claimants' proposal.

3. Procedures. We request a chambers conference to enable counsel to prepare the Hearing Procedures Order in a form useful to the Court. Among the subjects to be discussed are

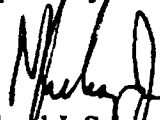
Hon. James M. Peck, U.S.B.J.
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hearing dates, a briefing schedule, and the possible bifurcation of the hearing into parts for claimants represented by counsel and claimants proceeding *pro se*.

4. Alternate Dispute Resolution. We have reviewed the Court's order regarding Alternate Dispute Resolution Procedures in the SIPA Proceeding (ECF 7351, Sept. 26, 2013). Claimants are willing to discuss the possibility of mediation if the Court believes it appropriate.

We respectfully request a conference at the Court's earliest convenience after October 25, 2013. If the Court prefers to have a status conference on the record, we will file and serve on all claimants a Notice for a date the Court selects.

Respectfully submitted,



Richard J. Schager, Jr.

RJS/kr

cc: Denise Alvarez, Esq. - Weil Gotshal & Manges LLP
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